

Tamara L. Kapaloski (#13471)
DORSEY & WHITNEY LLP
111 S. Main Street, Suite 2100
Salt Lake City, UT 84111
Telephone: (801) 933-7360
Fax: (801) 933-7373
kapaloski.tammy@dorsey.com

Case Collard (admitted pro hac vice)
DORSEY & WHITNEY LLP
1400 Wewatta Street, Suite 400
Denver, CO 80202-5549
Telephone: (303) 689-3400
Fax: (303) 629-3450
collard.case@dorsey.com

Attorneys for Plaintiffs

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF UTAH, CENTRAL DIVISION**

CRUMBL LLC, a Utah Limited Liability Company, **CRUMBL IP, LLC**, a Utah Limited Liability Company, and **CRUMBL FRANCHISING, LLC**, a Utah Limited Liability Company,

Plaintiffs,

vs.

DIRTY DOUGH LLC, an Arizona Limited Liability Company, and **BRADLEY MAXWELL**,

Defendants.

**JOINT STATUS UPDATE
REGARDING DISCOVERY DISPUTE**

Civil No. 2:22-cv-00318-HCN-CMR

Judge Howard C. Nielson, Jr.
Magistrate Judge Cecilia M. Romero

Plaintiffs Crumbl LLC, Crumbl IP, LLC, and Crumbl Franchising, LLC (collectively “Crumbl”) and Defendant Dirty Dough LLC (“Dirty Dough”), through their undersigned counsel, respectfully submit this Joint Status Update Regarding Discovery Dispute and state as follows:

1. On October 14, 2022, Crumbl filed a Short Form Discovery Motion related to Dirty Dough’s responses to Crumbl’s First Set of Discovery Requests. *See* ECF No. 42 (the “Discovery Motion”).

2. On October 31, 2022, the Court granted the Discovery Motion in part. *See* ECF No. 55.

3. Specifically, the Court ordered, in part, that within 10 days of the Court's Order, "Dirty Dough must submit complete supplemental responses." *See id.* The Court further ordered the parties to "meet and confer within five days following the supplementation to address any outstanding issues." *Id.*

4. Pursuant to the Court's Order, Dirty Dough's deadline to supplement its discovery responses was November 10, 2022, and Crumbl's deadline to meet and confer regarding any outstanding issues is November 15, 2022.

5. On Monday, November 14, 2022, Crumbl sent a letter to Dirty Dough regarding outstanding issues in Dirty Dough's Second Supplemental Responses, and requested a telephonic meet and confer. *See Exhibit A.*

6. On November 16, 2022, counsel for Dirty Dough and counsel for Crumbl met telephonically regarding the outstanding issues in Dirty Dough's Second Supplemental Responses.

7. During the telephonic meet and confer, counsel for Dirty Dough stated Dirty Dough's intent to rectify the outstanding issues and committed to serve Dirty Dough's Third Supplemental Discovery Responses by or on Friday, November 18, and to produce additional documents by Monday, November 21.

8. Counsel for Crumbl agreed to this timeline. Upon receiving and reviewing Dirty Dough's Third Supplemental Discovery Responses and additional documents, Crumbl will bring any remaining outstanding issues to the Court's attention.

Respectfully submitted this 17th day of November, 2022,

/s/ Tamara L. Kapaloski
Case Collard
Tamara L. Kapaloski
DORSEY & WHITNEY LLP
Attorneys for Plaintiffs

/s/ Jared E. Berg

Jared E. Berg

BERG LAW LLC

Attorneys for Defendant Dirty

Dough, LLC

CERTIFICATE OF SERVICE

I hereby certify that on the 17th day of November, 2022, a true and correct copy of the foregoing document was electronically filed with the Court's CM/ECF system which sent electronic notice to the following:

Jared E. Berg: jberg@berglawllc.com

Sean N. Egan: seannegan@sneganlaw.com

/s/ Tamara L. Kapaloski